
UNITED STATES OF AMERICA,	:	Case No.: 2:19-cv-01986-GMN-DJA
	:	
Plaintiff,	:	
	:	
v.	:	STIPULATION AND ORDER TO EXTEND
	:	DEADLINE FOR DEFENDANTS
	:	JPMORGAN CHASE BANK, N.A., AND
	:	CHASE MORTGAGE COMPANY TO
	:	RESPOND TO PLAINTIFF'S COMPLAINT
	:	(FIRST REQUEST)
JEFFREY A. MARTINEZ, individually, and as	:	
Trustee of the Martinez Family Trust; DOLORES	:	
M. MARTINEZ, individually and as Trustee for	:	
the Martinez Family Trust; THE MARTINEZ	:	
FAMILY TRUST; MARTINEZ &	:	
ASSOCIATES, INC. (NV20041370692);	:	
MARTINEZ & ASSOCIATES INC.	:	
(NV20181033912); SIERRA MORTGAGE	:	
CORPORATION; FIDELITY NATIONAL	:	
TITLE; CHASE MORTGAGE COMPANY; JP	:	
MORGAN CHASE BANK NATIONAL	:	
ASSOCIATION; NEVADA MORTGAGEE	:	
ASSISTANCE COMPANY, LLC; THE COOPER	:	
CASTLE LAW FIRM, LLP; RHODES RANCH	:	
ASSOCIATION; and REPUBLIC SILVER	:	
STATE INC., DBA, REPUBLIC SERVICES,	:	
	:	
Defendants.	:	

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1 attorney Justin T. Grim, Esq., that Defendants Chase may have additional time within which to
2 answer or otherwise respond to Plaintiff's Complaint. Specifically, the parties have agreed to
3 extend Defendants' time to respond. Defendants may answer or otherwise respond to Plaintiff's
4 Complaint on or before January 31, 2020.

5 The parties further agree that good cause exists for this extension. The amended response
6 deadline allows Defendants to continue investigating the matter and for the parties to continue
7 their discussions regarding the dispute.

8 Signed this 13th day of January, 2020 Signed this 13th day of January, 2020

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10 McCALLA RAYMER LEIBERT PIERCE, LLP

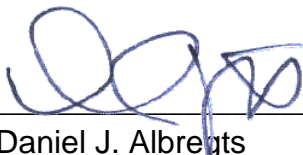
11
12 By: /s/ Justin T. Grim
13 Justin T. Grim, Esq.
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Attorney for JP Morgan Chase Bank, N.A.;
and Chase Mortgage

By: /s/E. Carmen Ramirez
E. Carmen Ramirez
U.S. Department of Justice, Tax Division
Tax Division
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Ben Franklin Station
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202-616-2885
Attorney for United States of America

18 **ORDER**

19 **IT IS ORDERED.** Defendant shall answer or otherwise respond to Plaintiff's Complaint
20 on or before January 31, 2020.

21 Dated this 15th day of January, 2020.

22
23 

24 Daniel J. Albregts
United States Magistrate Judge

25 Submitted by:

26 /s/ Justin T. Grim
27 Justin T. Grim, Esq.
28 McCalla Raymer Liebert Pierce LLP
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